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6 Attorneys for Defendant
KENNETH JAY LAITMAN
7 *also known as* John Roosevelt Rodman

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 KENNETH JAY LAITMAN, *also*
15 *known as* John Roosevelt Rodman,

16 Defendant.

Case No. 1:22-cr-00154-ADA-BAM

**STIPULATION TO VACATE STATUS
CONFERENCE AND SET FOR CHANGE-
OF-PLEA HEARING; ORDER**

Date: January 16, 2024

Time: 8:30 a.m.

Judge: Hon. Charles R. Breyer

17 IT IS HEREBY STIPULATED by and between the parties through their respective
18 counsel, Assistant United States Attorney Joseph Barton, counsel for plaintiff, and Assistant
19 Federal Defender Erin Snider, counsel for Kenneth Jay Laitman, also known as John Roosevelt
20 Rodman, that the Court may vacate the status conference currently scheduled for December 13,
21 2023, at 1:00 p.m. and set a change-of-plea hearing on January 16, 2024, at 8:30 a.m.

22 The parties agree and request that the Court make the following findings:

- 23 1. By previous order, this matter was set for a status conference on December 13,
24 2023, at 1:00 p.m.
- 25 2. The parties have reached a tentative resolution to resolve the case.
- 26 3. The parties therefore request that the Court vacate the December 13, 2023 status
27 conference and set a change-of-plea hearing on January 16, 2024, at 8:30 a.m.
- 28 4. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,

1 *et seq.*, within which trial must commence, the parties agree that the time period of December 13,
2 2023, to January 16, 2024, inclusive, is excludable pursuant to 18 U.S. C. § 3161(h)(1)(G) and
3 (h)(7)(B)(iv). Specifically, the parties agree that the ends of justice served by continuing the case
4 as requested outweigh the interest of the public and the defendant in a trial within the original
5 date prescribed by the Speedy Trial Act because the continuance ensures continuity of counsel
6 and the delay results from defense counsel's continued review of discovery and case assessment,
7 defense counsel's need to review the plea agreement with her client, and the court's
8 consideration of the plea agreement.

9 **IT IS SO STIPULATED.**

10 Respectfully submitted,

11 PHILLIP A. TALBERT
12 United States Attorney

13 Date: December 6, 2023

/s/ Joseph Barton
14 JOSEPH BARTON
Assistant United States Attorney
15 Attorney for Plaintiff

16 HEATHER E. WILLIAMS
17 Federal Defender

18 Date: December 6, 2023

/s/ Erin Snider
19 ERIN SNIDER
Assistant Federal Defender
20 Attorney for Defendant
KENNETH JAY LAITMAN, also known as
21 John Roosevelt Rodman

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ORDER

IT IS SO ORDERED. The status currently scheduled for December 13, 2023, at 1:00 p.m. is vacated. A change-of-plea hearing is hereby set for **January 16, 2024, at 8:30 a.m. before the District Court Judge.** For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et seq.*, within which trial must commence, the time period of December 13, 2023, to January 26, 2024, inclusive, is excludable pursuant to 18 U.S.C. § 3161(h)(1)(G) and (h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: **December 6, 2023**

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE